



Ex. 6 Personal Privacy (PP)

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December 8, 2016

Mr. Shawn McGrath
Regional Administrator
US EPA Region 8
1595 Wynkoop St.
Denver, CO 80202

Dear Mr. McGrath,

Pursuant to my meeting with Douglas Minter on December 5, 2016, I have the following concerns and questions about your plan to issue a draft permit for 4 Class III and 8 class V injection wells at the Dewey Burdock Area north of Edgemont, South Dakota on behalf of Powertech.

It is my understanding that you intend to issue this draft permit for the 12 injection wells without having reviewed in depth, substantial issues which Powertech has failed to address in its previous permit applications.

These are:

1.) How do the extensive fractures that allow contamination to reach areas and aquifers both inside and outside the project area, affect water quality in the area? Have you characterized the effects of this pollution on water quality, since the Minnelusa aquifer is a drinking water aquifer?

The testimonies of Dr. Hannan LaGarry to the NRC and the ASLB in 2014 show that there are extensive fractures, fissures, sinkholes and breccia pipes in the Dewey Burdock uranium mining area which allow communication of contaminants with other geologic units such as: water aquifers, cave structures, and other hydrogeological landscape features that will result in contaminating water aquifers and springs.

2.) Will you have the same requirements as the NRC in closing those old Dewey Burdock boreholes left by previous mining and exploration activities before any new drilling is done?

There are currently 7650 old boreholes that have not been properly closed, left by previous uranium mining and exploration activities. As a condition of the NRC permit, the NRC required that these 7650 old boreholes be identified and properly closed before **any** mining activity would be permitted. This should be done before any are drilled. No work has been done on this to date.

3.) Will you provide an exact description of the kinds and concentrations of all wastes to be injected, both in the Class III and Class V injection wells, with the exact locations and and depths of these wells?

It is our position that these wastes will contain radioactivity, heavy toxic metals, unrecoverable uranium products and toxic materials potentially used in mining activities.

4.) Have you considered the potential hazards of disturbing the extensive underground contamination of the Black Hills Army Depot from chemical warfare agents?

The Black Hills Army Depot operated from 1941 to 1968 on a 21,000 acre site just 8 miles south of Edgemont, South Dakota. This was the largest munitions demolition and storage site of its era. Hundreds of thousands of tons of extremely lethal chemical warfare agents were shipped into the Black Hills Army Depot. These munitions continue to pose a terrible threat to the underground structures around the site, and have percolated into the shale and the Wind Cave Structures under the Depot. It is our position that disturbing the underground structures of the area with injection wells will disturb these munitions and could cause catastrophic results. We could create lethal contamination of a proportion with which we could not cope. See: Final Archive Search Report, Preliminary Assessment of Ordinance Contamination at the Former Black Hills Army Depot, South Dakota. Contract Number DACA-87-91-D-0037, prepared for US Army Corps of Engineers, Huntsville Division October 1992

5.) No earthquake risk reduction plans and actions, as recommended by the USGS, have been developed for the Dewey Burdock area. No mention has been



made of the proximity of the injection wells to the Dewey Fault. Have you considered the effect of induced earthquakes known to be caused by injection wells?

The infrastructure in southwest South Dakota, was not designed to withstand earthquakes due to the low historic incidence of natural earthquakes. It has been proven since 1951, that deep injection wells cause earthquakes.

6.) Has a provision been made for bonding to mitigate damages caused by this proposal?

Potential damages could be in the hundreds of millions of dollars.

7.) What is the legal basis for overriding the Clean Water Act, when two of the Class III wells are in the Minnelusa aquifer, a drinking water aquifer?

Respectfully submitted,

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